

FILED

DEC 19 2019

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

NICHOLAS STOPPELMANN,

Defendant.

No.

4:19CR01053 JAR/SPM

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term:

- (a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));
- (b) "sexually explicit conduct" to mean actual or simulated
 - (i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal; whether between persons of the same or opposite sex,
 - (ii) bestiality,
 - (iii) masturbation,
 - (iv) sadistic or masochistic abuse, or
 - (v) lascivious exhibition of the genitals or pubic area of any person (18

U.S.C. §2256(2)(A)); and

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6));

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct.

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about, July 1, 2018 through February 21, 2019, in the Eastern District of Missouri, and elsewhere,

NICHOLAS STOPPELMANN,

the defendant herein, did knowingly distributed an image and a video of child pornography over the internet, a means or facility of interstate commerce, and these images and videos were visual

depictions that involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of a minor engaging in sexually explicit conduct, including but not limited to the following:

1. "10 yo with Hard-on gets Fucked.avi" – a video file that depicts a adult's penis penetrating a minor child;
2. "Matt and his boy full.mp4" – a video file that depicts a male penis penetrating an infant.

In violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT II

The Grand Jury further charges that:

1. The allegations contained in paragraphs one, two, and three of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. Between on or about July 1, 2018 through February 21, 2019, in the Eastern District of Missouri, and elsewhere,

NICHOLAS STOPPELMANN,

the defendant herein, did knowingly possess material that contains an image and video of child pornography that was produced using materials that traveled in interstate and foreign commerce, to wit, a SD card, that was produced outside of Missouri and therefore has traveled in interstate and foreign commerce, and said SD card contained child pornography, including but not limited to the following:

1. "246107869_385964.jpg" – a graphic image file depicting a nude minor child holding a penis;
2. "1_5134491500943507573.mp4" – a video file depicting a male anally penetrating a male minor toddler-aged child;

3. "1_5136537868107145278.mp4" – a video file depicting infant and toddler aged minor children being orally and anally penetrated by an adult.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
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COLLEEN LANG, #56872MO
Assistant United States Attorney